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February 12, 2025

VIA ECF

Honorable Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Goolden v. Wardak and Wardak v. Goolden*, No. 1:19-CV-6257 (ALC)(VF)

Dear Judge Figueredo,

Our office represents Plaintiff/Counterclaim-Defendant Sarah Goolden (“Plaintiff”) in the above-referenced matter. We submit this letter jointly with Counsel for Defendant/Counterclaim-Plaintiff (“Defendant”) Hamed Wardak at this Court’s direction regarding the status of discovery in this matter.

On January 30 and January 31, 2025, the parties completed the deposition of Defendant Wardak. To date the parties have not received the transcript of the two-day deposition and anticipate that review of said transcript may lead to additional discovery demands. Further, Plaintiff’s counsel intends to provide disclosures under Fed. R. Civ. P. 26(a)(2), which could require Defendant to depose the identified expert witnesses, and may lead to additional fact discovery concerning such identified witnesses.

For the foregoing reasons, the parties jointly request an additional **90 days** from the date of this order to complete fact discovery.

Most Respectfully,



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